

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

RECEIVED  
 SEP - 3 1997  
 FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF THE SECRETARY

In the Matter of:

Access Charge Reform

CC Docket No. 96-262

Price Cap Performance Review for Local  
 Exchange Carriers

CC Docket No. 94-1

Transport Rate Structure and Pricing

CC Docket No. 91-213

**GTE REPLY TO COMMENTS AND OPPOSITIONS**

GTE Service Corporation and its affiliated domestic local exchange and interexchange telephone companies<sup>1</sup> (collectively "GTE") respectfully submit their reply to oppositions and comments filed in regard to petitions for reconsideration of the Federal Communications Commission's ("FCC" or "Commission") First Report and Order in the above-captioned proceeding.<sup>2</sup> As discussed more fully below, and expressed in its Opposition and Comments, GTE urges the Commission to reject requests to reverse its initial steps toward a more rational access charge structure and to grant the petitions seeking modifications that would: permit assessment of access charges on interstate service provided via unbundled elements; insulate the exogenous price cap adjustment related to universal service from the annual productivity offset; use historical, rather than projected, figures to determine presubscribed interexchange carrier charge ("PICC")

<sup>1</sup> These companies include: GTE Alaska, Incorporated; GTE Arkansas Incorporated; GTE California Incorporated; GTE Florida Incorporated; GTE Hawaiian Telephone Company Incorporated; The Micronesian Telecommunications Corporation; GTE Midwest Incorporated; GTE North Incorporated; GTE Northwest Incorporated; GTE South Incorporated; GTE Southwest Incorporated; Contel of Minnesota, Inc.; Contel of the South, Inc.; and GTE Card Services Incorporated d/b/a GTE Long Distance.

<sup>2</sup> Access Charge Reform, CC Docket No. 96-262, FCC 97-158 (rel. May 16, 1997) (First Report and Order) ("Access Reform Order").

and subscriber line charge ("SLC") levels; allow a flexible, prospective approach to billing the PICC; and adopt a PBX-equivalent methodology for computing PICCs on Centrex lines.

**I. THE COMMISSION SHOULD NOT REVISIT ITS DECISION TO ADOPT A COST-BASED, THREE-PART TRANSPORT RATE STRUCTURE.**

As GTE expressed in its Comments, the Commission's decision to replace the current, subsidy-laden unitary pricing structure for tandem-switched transport with a new three-part rate structure is supported by compelling legal and policy justifications, and should not be reconsidered. A number of commenters join GTE in acknowledging that the new three-part structure is designed to reflect the way tandem-switched transport costs are incurred and promotes rational competition in the interexchange and access markets.<sup>3</sup> Furthermore, this transition from the current, irrational pricing system to a rate structure that reflects cost causation principles is compelled by the Communications Act ("Act").<sup>4</sup>

The several interexchange carriers ("IXCs") that have asked the Commission to retain the current unitary pricing structure for tandem-switched transport essentially reiterate arguments that already have been considered and rejected by the Commission in this proceeding.<sup>5</sup> For the first time in MCI's comments, it urges the Commission to retain the existing unitary rate structure or, in the alternative, to impose a cap on the rates that may be recovered under the new three-part structure to what an ILEC would have recovered under the old unitary pricing structure.<sup>6</sup> This proposal, brought forth much too late in this proceeding, should be rejected because it is a thinly veiled attempt to reinstate the unitary structure and, by denying ILECs the ability to recover these costs or forcing ILECs to recover them from other services, is clearly inconsistent with the cost-based approach required by the Act.

---

<sup>3</sup> See AT&T Comments at 3-7; Bell Atlantic Comments at 3; BellSouth Comments at 5; Southern New England Telephone Comments at 4-5; Time Warner Comments at 13-15; USTA Comments at 5-6; and US West Comments at 10-12.

<sup>4</sup> See GTE Comments at 3; AT&T Comments at 3.

<sup>5</sup> See BellSouth Comments at 3.

**II. THE FCC'S DECISION TO PRECLUDE ASSESSMENT OF INTERSTATE ACCESS CHARGES ON SERVICE PROVIDED VIA UNBUNDLED NETWORK ELEMENTS IS UNLAWFUL AND INCONSISTENT WITH THE GOAL OF UNIVERSAL SERVICE.**

The Commission's decision to remove interstate services provided through unbundled network elements from the access charge regime is unlawful. GTE supports several petitioners who argue that this ruling is arbitrary and anticompetitive.<sup>7</sup>

The parties filing comments in support of the Commission's decision in this matter did nothing to refute GTE's principal assertions. First, GTE has demonstrated that exempting purchasers of unbundled elements from access charge payments violates the nondiscrimination and competitive neutrality requirements of the Communications Act because it frees these carriers from their statutory obligation to contribute to universal service. This will adversely affect the universal service funding mechanism by reducing the support received by incumbent local exchange carriers ("ILECs"). Although the Commission recognized this fact, it erred in merely dismissing its impact on ILECs' ability to fulfill their universal service obligations as "not dramatic[.]"<sup>8</sup> Second, this decision is inconsistent with the Eighth Circuit's recent conclusions in *CompTel v. FCC*, where the court noted that prohibiting assessment of access charges on users of unbundled elements before all universal service subsidies are removed from access charges threatens a "serious disruption in universal service" -- an impact which it held that Congress did not intend.<sup>9</sup>

---

(...Continued)

<sup>6</sup> MCI Comments at 12.

<sup>7</sup> GTE intends to address this issue in its pending appeal of the Commission's *Access Reform Order*. GTE believes it must respond to the petitions for reconsideration filed in this proceeding which address this issue to protect its interests in the event the FCC were to act on these petitions for reconsideration before the Court acts on GTE's petition for review.

<sup>8</sup> *Access Reform Order*, ¶ 338. Failure to apply access charges to users of unbundled network elements will undermine universal service funding to the extent that unbundled network elements fail to recoup the same universal service subsidies as still exist in interstate access charges.

<sup>9</sup> *Competitive Telecommunications Ass'n v. FCC*, No. 96-3604, 1997 WL 352284 (8th Cir., June 27, 1997); see also GTE Comments at 21-23.

Contrary to MCI's suggestion, the Commission's decision to deny a petition to stay this disputed aspect of the *Access Reform Order* does not change the fact that this issue was incorrectly decided.<sup>10</sup>

### **III. GRANTING ACCESS CUSTOMERS A FRESH LOOK TO SELECT COMPETITIVE TRANSPORT OFFERINGS IS UNLAWFUL AND UNWARRANTED.**

Petitioners have failed to establish that the Commission should establish a "fresh look" opportunity and allow IXCs to walk away from existing term or volume commitments with ILECs. Parties supporting a "fresh look" unfairly portray term commitments as devices which harm customers and restrict customer flexibility. KMC's suggestion that IXCs are "trapped" in term commitments is thus specious,<sup>11</sup> and ignores the fact that IXCs willingly entered these agreements, and may have accepted term commitments in exchange for lower rates or other benefits.<sup>12</sup> Moreover, the "customers" which KMC suggests are in need of protection are large, sophisticated telecommunications carriers who were certainly aware of the ongoing regulatory developments and were capable of protecting their interests from the outset.

KMC notes that a number of state public utility commissions have decided to implement "fresh look" policies for term contracts for local telephone service, and suggests that the Commission should follow their lead.<sup>13</sup> These two situations are not analogous. Unlike the carrier-to-carrier term commitments for access service discussed here, these state proceedings involved contracts between LECs and end users, who are presumably less likely to be aware of the changing regulatory environment when agreeing to term contracts than would an IXC.<sup>14</sup> Moreover, the FCC already allowed a "fresh look" opportunity when exchange access competition was first initiated.<sup>15</sup>

---

<sup>10</sup> See MCI Comments at 22 (discussing the Commission's Order Denying Joint Petition For Stay, In the Matter of Access Charge Reform, CC Docket No. 96-262 (rel. June 18, 1997)).

<sup>11</sup> KMC Comments at 3.

<sup>12</sup> Bell Atlantic Comments at 9.

<sup>13</sup> KMC Comments at 4-6.

<sup>14</sup> See KMC Comments at 5, citing state public utility commission decisions allowing "fresh looks" at contracts between end-user customers and LECs for local telephone services, including local exchange

Finally, the Commission should reject MCI's proposal to impose a ceiling on early termination penalties under existing term commitments for access service.<sup>16</sup> For the same reasons as expressed above, it would be improper for the FCC to alter the terms of agreements between carriers that were freely negotiated and are not even alleged to be unreasonable or unlawful.

#### **IV. THE COMMISSION SHOULD NOT EXPAND ITS DECISION TO REQUIRE WAIVERS OF NON-RECURRING CHARGES.**

GTE urges the Commission not to expand its questionable decision to require LECs to waive non-recurring charges for network adjustments required when a transport customer converts trunks from tandem-switched to direct-trunked transport. Parties urging the Commission to create additional waivers provide no legitimate reason why ILECs should not be allowed to recover the costs of establishing or changing these network configurations. GTE agrees with Bell Atlantic that it would be unreasonable and confiscatory for the FCC to require LECs to perform network reconfigurations without being allowed to recover the costs of those activities.<sup>17</sup> Accordingly, the Commission should reject TCG's request that it waive non-recurring charges for establishing new points of presence ("POPs") at or near tandems.<sup>18</sup> The FCC also should reject WorldCom's request that ILECs be precluded from recovering costs every time existing dedicated transport trunks are augmented (e.g., when additional capacity is added to an existing trunk group) or upgraded (e.g., from DS1s to DS3s).<sup>19</sup> WorldCom, and the few commenters supporting its position, did not justify why ILEC ratepayers should bear these IXC costs of doing business.<sup>20</sup> An

---

(...Continued)

service, intraLATA toll, private line service and special access customers.

<sup>15</sup> See GTE Comments at 12.

<sup>16</sup> See MCI Comments at 17.

<sup>17</sup> See Bell Atlantic Comments at 8-9; GTE Comments at 10-11; see also BellSouth Comments at 11.

<sup>18</sup> See GTE Comments at 10-11, discussing TCG Petition at 4-6.

<sup>19</sup> WorldCom Petition at 19-20.

<sup>20</sup> See *id.*; see also Sprint Comments at 4, MCI Comments at 15-16.

expanded waiver rule would create the perverse result of requiring ILECs to subsidize competitive carriers' network configuration decisions. This result is anticompetitive and should be avoided.

Finally, GTE agrees with BellSouth and Sprint that it would be entirely unreasonable to require an ILEC to waive reconfiguration charges incurred when customers shift traffic from ILEC networks to competitive access providers' ("CAPs") networks.<sup>21</sup> Such a waiver would be designed to affect a transport customer's choice of carrier, not to promote rational network configuration decisions that the FCC intended to achieve by mandating these waivers.<sup>22</sup>

## **V. THE FCC SHOULD NOT APPLY THE "X FACTOR" TO UNIVERSAL SERVICE CONTRIBUTIONS.**

GTE reiterates its support for USTA's request that the annual productivity offset (the "X-factor") not be applied to universal service contribution amounts so that LECs may have the full opportunity to recover universal service contributions from end user customers.<sup>23</sup> Application of the X-factor to universal service support levels is completely irrational. These contribution amounts are fixed by law, and therefore cannot be reduced by enhanced ILEC efficiency.

AT&T acknowledges this concern, but the alternative solution it proposes is unnecessary and overly complicated.<sup>24</sup> AT&T's proposal would require ILECs to make *quarterly* exogenous adjustments to their price caps. In addition, AT&T would require the LEC flowback assigned to the Common Line basket to be recovered from end-users through the SLC or, if the SLC cap has been reached, through a new separate rate element. This methodology would unnecessarily complicate ILECs' accounting and tariff revision processes. Therefore, AT&T's methodology should be rejected.

---

<sup>21</sup> Sprint Comments at 5; BellSouth Comments at 11.

<sup>22</sup> See *Access Reform Order*, ¶ 176.

<sup>23</sup> See GTE Comments at 15, discussing USTA Petition at 5-6.

<sup>24</sup> AT&T Comments at 17. GTE endorses AT&T's preferred solution, mandatory end-user surcharges. GTE Comments at 16.

Moreover, AT&T's criticism of USTA's proposed methodology is unfounded.<sup>25</sup> AT&T offers no support for its contention that growth in demand for ILECs' services will be sufficient to offset any reduction in universal service support caused through application of the X-factor, nor explains why ILECs should be required to fund their universal service obligations from the growth in demand for their services.

**VI. PICC AND SLC LEVELS SHOULD BE DETERMINED USING BASE PERIOD FIGURES RATHER THAN PROJECTIONS.**

GTE joins Bell Atlantic, SNET, Sprint and US West in urging the Commission to reconsider its decision to use projections of demand and revenues in the calculation of PICCs. This methodology should also be expanded to the calculation of SLCs.<sup>26</sup> The *Access Charge Order* mixes base period and projection figures in calculating different parts of the SLC and PICC, which causes a host of problems.<sup>27</sup> GTE agrees with these commenters that the use of base period revenues divided by projected loops in the calculation of PICCs will drive the levels of PICCs down over time, which will prevent PICCs from recovering growth in loop costs. Indeed, demand and cost projections are inconsistent with the price cap system of regulation, which largely relies on actual data and is designed to separate pricing from the inadequate methodologies used in rate of return regulation. In addition, rather than using publicly available historical data, the use of projections makes annual access tariff filings subject to disputes over forecasting methodologies.<sup>28</sup> The FCC can avoid these controversies by using historical data for both PICCs and SLCs. Historical figures are more reliable, less controversial and, at most, would entail a year's lag in taking into account demand and revenue changes. Accordingly, the FCC should adopt an approach that utilizes base period figures in all calculations for both the PICC and SLC.

---

<sup>25</sup> See AT&T Comments at 17, n.33.

<sup>26</sup> See Bell Atlantic Comments at 23-24, discussing Sprint Petition at 6; see also SNET Comments at 5; US West Comments at 13-14.

<sup>27</sup> See *id.*

## VII. IF THE PICC IS NOT ELIMINATED, IT SHOULD BE BILLED PROSPECTIVELY.

As GTE urged in its Comments, the Commission should abolish the PICC and instead allow ILECs to recover common line costs through the SLC or through increased universal service support. The PICC presents a host of administrative challenges that will impose a tremendous implementation burden on ILECs. However, if the FCC decides to maintain the PICC charge, it should adopt a flexible approach, permitting ILECs to administer the system in a reasonable fashion. For example, MCI's proposal that ILECs should bill PICCs in arrears and prorated according to the exact number of days a customer is presubscribed to a particular IXC should be denied.<sup>29</sup> This approach would massively increase the administrative burden placed on ILECs; yet the level of precision it would achieve is not significant enough to warrant the additional cost and difficulty. ILECs typically bill flat monthly charges in advance and should be permitted to continue this reasonable practice in this instance.

MCI also urges the Commission to impose on ILECs a laundry list of additional administrative burdens related to PICC accounting, including providing IXCs with a range of customer-by-customer data.<sup>30</sup> Neither MCI, Sprint nor any other commenters present compelling reasons as to why ILECs should be required to assume the burden of routinely compiling and transmitting this customer information to IXCs. Indeed, IXCs may easily obtain any of this specific information from their own customers. In the event that discrepancies arise, normal billing reconciliation processes can resolve any problems without burdensome information production requirements.

---

(...Continued)

<sup>28</sup> See Bell Atlantic Comments at 23-24; US West Comments at 13-14.

<sup>29</sup> MCI Comments at 4-6. Indeed, the Commission expressly decided to permit billing on a monthly basis as opposed to requiring pro-rating. See *Access Reform Order* at ¶ 92.

<sup>30</sup> *Id.* at 7.

**VIII. APPLYING PICC'S ON A PER-LINE BASIS WOULD DISPROPORTIONATELY BURDEN CENTREX USERS COMPARED TO SIMILARLY-SIZED PBX ARRANGEMENTS.**

In its comments, GTE supported USTA's proposal that the PICC be assessed, if at all, on a trunk-equivalency basis.<sup>31</sup> Applying PICCs on a per-line basis would disproportionately burden users of Centrex systems, which use a design that connects all internal lines to outside lines, compared to customers using functionally-equivalent PBX arrangements, which may carry the same traffic but which use fewer outside lines. This decision clearly favors one technology over another, which is antithetical to the "competitive neutrality" policies embodied in the FCC's policies and in the Communications Act.

Commenters opposing this important clarification fail to justify the discriminatory result that would occur under the current rule. Time Warner suggests that this decision is justified since the FCC already requires multi-line businesses to shoulder a greater share of the burden under the new access charge regime.<sup>32</sup> This argument in no way justifies a result that so clearly favors one technology over another for multi-line customers. Further, Time Warner's analogy to the FCC's treatment of PICCs on ISDN service is unavailing. Indeed, in the case of ISDN, the FCC in effect recognized that applying PICCs on a straight per-channel basis could put an ILEC at a competitive disadvantage with respect to other carriers by imposing far more PICCs on ISDN service using primary rate interfaces ("PRIs") than on basic rate interfaces ("BRIs"), and therefore modified its approach to avoid this competitive imbalance. Likewise, here, GTE urges the Commission to recognize that its rule would favor PBX over Centrex technology and to modify its approach to avoid this distortion.

---

<sup>31</sup> See GTE Comments at 19-20.

<sup>32</sup> Time Warner Comments at 7-9.

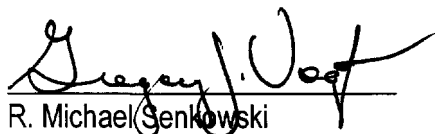
<sup>33</sup> Time Warner Comments at 7-9.

## VIII. CONCLUSION

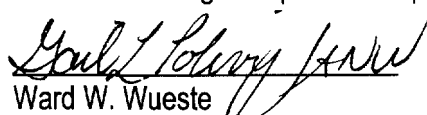
As GTE has urged in its Comments and here in this Reply, the Commission should not reconsider its decision to move towards a rational rate structure, but should consider a handful of key requests specified herein which will promote fair competition, preserve sufficient universal service support, and promote administrative simplicity.

Respectfully submitted,

GTE SERVICE CORPORATION  
and its affiliated local exchange  
and interexchange telephone companies



R. Michael Senkowski  
Jeffrey S. Linder  
Gregory J. Vogt  
WILEY, REIN & FIELDING  
1776 K Street, N.W.  
Washington, D.C. 20006  
(202) 429-7000



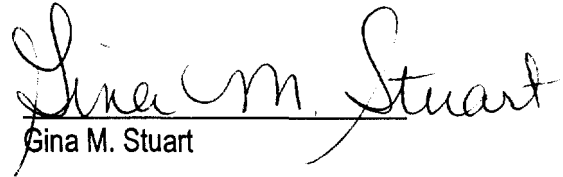
Ward W. Wueste  
Gail L. Polivy  
1850 M Street, N.W.  
Suite 1200  
Washington, D.C. 20036  
(202) 463-5200

Their Attorneys

September 3, 1997

CERTIFICATE OF SERVICE

I, Gina M. Stuart, hereby certify that a copy of the foregoing "Reply To Comments and Oppositions" was served upon the following via first class mail, postage prepaid on this 3<sup>rd</sup> day of September, 1997:

  
Gina M. Stuart

James S. Blaszak  
Kevin S. DiLallo  
Counsel for Ad Hoc Telecommunications Users Committee  
Levine, Blaszak, Block & Boothby, LLP  
1300 Connecticut Avenue, NW  
Suite 500  
Washington, D.C. 20036

Gene C. Schaerr  
James P. Young  
Counsel for AT&T  
1722 Eye Street, NW  
Washington, D.C. 20006

Michael S. Pabian  
Larry A. Peck  
Attorney for Ameritech  
Room 4H86  
2000 West Ameritech Center Drive  
Hoffman Estates, IL 60196-1025

Mark C. Rosenblum  
Peter H. Jacoby  
Judy Sello  
Counsel for AT&T  
295 North Maple Avenue  
Room 324511  
Basking Ridge, NJ 07920

Wayne V. Black  
C. Douglas Jarrett  
Susan M. Hafeli  
Counsel for American Petroleum Institute  
Keller and Heckman, LLP  
1001 G Street, NW  
Suite 400 West  
Washington, D.C. 20001

Robert Glass  
Boston University  
11 Vincent Street  
Cambridge, MA 02140

Glass Seigle & Liston  
75 Federal Street  
Boston, MA 02110

Edward Shakin  
Joseph DiBella  
Counsel for Bell Atlantic  
1320 North Court House Road  
Eighth Floor  
Arlington, VA 22201

M. Robert Sutherland  
Richard M. Sbaratta  
Counsel for Bell South  
Suite 1700  
1155 Peachtree Street, NE  
Atlanta, GA 30309-3610

Robert J. Aamoth  
Edward Yorkgitis, Jr.  
Joan M. Griffin  
Steven A. Augustino  
Counsel for Competitive Telecommunications Association  
Kelly Drye & Warren, LLP  
1200 19<sup>th</sup> Street, NW  
Suite 500  
Washington, D.C. 20036

Genevieve Morelli  
Exec. Vice President and General Counsel  
Competitive Telecommunications Association  
1900 M Street, NW  
Suite 800  
Washington, D.C. 20036

Randolph J. May  
Counsel for CompuServe Incorporated  
Sutherland, Asbill & Brennan, L.L.P.  
1275 Pennsylvania Avenue, NW  
Washington, D.C. 20004-2404

Andrew D. Lipman  
Dana Frix  
Counsel for Excel Telecommunications, Inc.  
Swidler & Berlin, Chartered  
3000 K Street, NW, Suite 300  
Washington, D.C. 20007

Cynthia B. Miller  
Counsel for Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Michael J. Shortley, III  
Counsel for Frontier Corporation  
180 South Clinton Avenue  
Rochester, NY 14646

Kathy L. Shobert  
General Communication, Inc.  
901 15<sup>th</sup> Street, NW  
Suite 900  
Washington, D.C. 20005

Herbert E. Marks  
James M. Fink  
Counsel for State of Hawaii  
Squire, Sanders & Dempsey, LLP  
1201 Pennsylvania Avenue, NW  
P.O. Box 407  
Washington, D.C. 20044

Dana Frix  
Tamar Haverty  
Counsel for Hyperion Telecommunications, Inc.  
Swidler & Berlin, Chartered  
3000 K Street  
Suite 300  
Washington, D.C. 20007

Brian R. Moir  
Counsel for International Communications Association  
2000 L Street, NW  
Suite 512  
Washington, D.C. 20036-4907

Garrett G. Mayer  
Chief, Regulatory Affairs  
Internal Services Department  
County of Los Angeles  
9150 East Imperial Blvd.  
Downey, California 90242

Jack D. Kelley  
Counsel for KLP, Inc. d/b/a Call America  
1201 South Alma School Road, Suite 2000  
Mesa, Arizona 85210

Russell M. Blau  
Kemal M. Hawa  
Counsel for KMC Telecom, Inc.  
Swidler & Berlin, Chartered  
3000 K Street, NW  
Suite 300  
Washington, D.C. 20007

Daniel S. Goldberg  
Kenneth Ferree  
Counsel for LBC Communications, Inc.  
1229 Nineteenth Street, NW  
Washington, D.C. 20036

Bradley Stillman  
Don Sussman  
Alan Buzacott  
MCI Telecommunications Corp.  
1801 Pennsylvania Avenue, NW  
Washington, D.C. 20006

Richard A. Askoff  
Counsel for National Exchange Carrier Association  
100 South Jefferson Road  
Whippany, New Jersey 07981

Perry S. Goldschein  
Regulatory Manager  
Counsel for National Exchange Carrier Association  
100 South Jefferson Road  
Whippany, New Jersey 07981

Russell M. Blau  
Tamar E. Haverty  
Counsel for RCN Telecom Services, Inc.  
Swidler & Berlin, Chartered  
3000 K Street, NW, Suite 300  
Washington, D.C. 20007

Margot Smiley Humphrey  
NRTA (The Rural Telephone Coalition)  
Koteen & Naftalin, LLP  
1150 Connecticut Avenue, NW  
Suite 1000  
Washington, D.C. 20036

David Cosson  
L. Marie Guillory  
NTCA (The Rural Telephone Coalition)  
2626 Pennsylvania Avenue, NW  
Washington, D.C. 20037

Lisa M. Zaina  
Stuart E. Polikoff  
OPASTCO (The Rural Telephone Coalition)  
21 Dupont Circle, NW  
Suite 700  
Washington, D.C. 20036

James U. Troup  
Steven J. Hamrick  
Counsel for Rural Telephone Companies  
Arter & Hadden  
1801 K Street, NW  
Suite 400K  
Washington, D.C. 20006-1301

Leon M. Kestenbaum  
Jay C. Keithley  
H. Richard Juhnke  
Sprint Corporation  
1850 M Street, NW  
11<sup>th</sup> Floor  
Washington, D.C. 20036

Wendy S. Bluemling  
Southern New England Telephone Company  
227 Church Street  
New Haven, CT 06510

Toby-Lynn Voss  
Counsel for Yavapai Telephone Exchange, Inc.  
d/b/a YTE Communications  
2001 West Camelback Road, Suite 450  
Phoenix, Arizona 85015

Bryan Rachlin  
General Counsel  
Telco Communications Group, Inc.  
4219 Lafayette Center Drive  
Chantilly, VA 20151

Dana Frix  
Tamar Haverty  
Counsel for Telco Communications Group, Inc.  
Swidler & Berlin, Chartered  
3000 K Street, NW  
Suite 300  
Washington, D.C. 20007

J. Manning Lee  
Vice President, Regulatory Affairs  
Teleport Communications Group, Inc.  
Two Teleport Drive, Suite 300  
Staten Island, NY 10311

Catherine R. Sloan  
Richard L. Fruchterman, III  
Richard S. Whitt  
WORLDCOM, INC.  
1120 Connecticut Avenue, NW  
Washington, D.C. 20036-3902

Peter A. Rohrbach  
David L. Sieradzki  
Steven F. Morris  
Counsel for Worldcom, Inc.  
Hogan & Hartson, LLP  
555 13<sup>th</sup> Street, NW  
Washington, D.C. 20004-1109

Kenneth F. Melley, Jr.  
Vice President of Regulatory Affairs  
U.S. Long Distance, Inc.  
9311 San Pedro  
Suite 100  
San Antonio, TX 78216

Mary McDermott  
Linda Kent  
Keith Townsend  
Hance Haney  
Counsel for United States Telephone Association  
1401 H Street, NW  
Suite 600  
Washington, D.C. 20005

Charles C. Hunter  
Catherine M. Hannan  
Counsel for Telecommunications Resellers Association  
Hunter Communications Law Group  
1620 I Street, NW  
Suite 701  
Washington, D.C. 20006

Joe D. Edge  
Richard J. Arsenault  
Tina M. Pidgeon  
Counsel for Puerto Rico Telephone Company  
Drinker Biddle & Reath  
901 15<sup>th</sup> Street, NW  
Suite 900  
Washington, D.C. 20005

\*International Transcription Services  
1231 20<sup>th</sup> Street, NW  
Room 112  
Washington, D.C. 20036

Brian Conboy  
Thomas Jones  
David R. Goodfriend  
Counsel for Time Warner Communications  
Holdings, Inc.  
Wikie Farr & Gallagher  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, NW  
Washington, D.C. 20036

Raeburn B. Pepler  
National Centrex Users Group  
P.O. Box 367  
Neenah, Wisconsin 54957-0367

\*Ms. Janice Myles  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W.  
Room 544  
Washington, D.C. 20554

Robert B. McKenna  
Jeffrey A. Brueggeman  
Attorneys for U.S. West, Inc.  
1020 19<sup>th</sup> Street, NW  
Suite 700  
Washington, D.C. 20036

\* VIA HAND DELIVERY